

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FORMER BL STORES, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**Re: D.I. 3261**

**CERTIFICATION OF COUNSEL REGARDING FURTHER REVISED ORDER  
(I) CONVERTING CHAPTER 11 CASES TO CASES UNDER CHAPTER 7,  
(II) ESTABLISHING DEADLINE FOR FILING FINAL CHAPTER 11 FEE  
APPLICATIONS AND SETTING A HEARING THEREON,  
AND (III) GRANTING RELATED RELIEF**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “**Debtors**”) hereby certify as follows:

1. On October 24, 2025, the Debtors filed the *Motion of Debtors for Entry of Order (I) Converting Chapter 11 Cases to Cases Under Chapter 7, (II) Establishing Deadline for Filing Final Chapter 11 Fee Applications and Setting a Hearing Thereon, and (III) Granting Related Relief* [D.I. 3261] (the “**Motion**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). Attached to the Motion as Exhibit A was the proposed form of order.

2. On November 3, 2025, the Debtors filed a revised proposed form of conversion order to respond to objections received from various parties [D.I. 3298-2].

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<sup>1</sup> The debtors and debtors in possession in these chapter 11 cases, along with the last four digits of their respective employer identification numbers, are as follows: Great Basin, LLC (6158); Former BL Stores, Inc. (9097); Former Management Stores of Ohio, LLC (7948); Consolidated Property Holdings, LLC (0984); Former Furniture Stores of Ohio, LLC (7868); Former Savings Stores of California, LLC (5262); Former Stores of Ohio, LLC (6811); Former Tenant Stores of Ohio, LLC (0552); Former Savings Stores of Ohio, LLC (6182); CSC Distribution LLC (8785); Closeout Distribution, LLC (0309); Durant DC, LLC (2033); AVDC, LLC (3400); GAFDC LLC (8673); PAFDC LLC (2377); WAFDC, LLC (6163); INFDC, LLC (2820); Former eCommerce Stores of Ohio, LLC (9612); and Former Low Cost Stores of Ohio, LLC (3277). The address of the debtors’ corporate headquarters is 4900 E. Dublin-Granville Road, Columbus, OH 43081.

3. On November 4, 2025, the Debtors filed a further revised proposed form of conversion order [D.I. 3302-1] (the “**Conversion Order**”) to resolve additional informal comments from the Office of the United States Trustee (the “**U.S. Trustee**”).

4. On November 4, 2025, the Court held a hearing (the “**Hearing**”) to consider the relief requested in the Motion. On the record at the Hearing, the U.S. Trustee confirmed that it did not object to entry of the Conversion Order.

5. At the hearing, the Court approved the Conversion Order. Debtors’ counsel requested that entry of the Conversion Order be deferred pending completion of additional disbursements in accordance with the Administrative Expense Claims Procedures Order. Those disbursements have now been completed.

6. The Debtors shared the Conversion Order again with the U.S. Trustee and informed the U.S. Trustee of their intent to submit the Conversion Order for entry.

WHEREFORE, the Debtors respectfully request that the Court enter the Further Revised Order attached hereto as **Exhibit A** at its earliest convenience.

*[Remainder of page left intentionally blank]*

Dated: November 7, 2025  
Wilmington, Delaware

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